

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION)
OPIATE LITIGATION)
) MDL No. 2804
THIS DOCUMENT RELATES TO:) Case No. 17-md-2804
)
Track Three Cases)

VIDEOTAPED RULE 30(b)(6) DEPOSITION OF
APRIL J. CARAWAY
Conducted via Zoom
Warren, Ohio
Thursday, March 4th, 2021

REPORTED BY: GREG S. WEILAND, CSR, RMR, CRR
JOB NO.: 4477980

1 here, Ms. Caraway, are you prepared to testify
2 regarding each of those topics?

3 A. I am.

4 Q. And what did you do to prepare to give
5 testimony on each of those topics?

6 A. I reviewed a lot of materials. I talked
7 with some other County department heads and staff,
8 you know, for some of the things that maybe I wasn't
9 directly involved in.

10 I've done the work, you know, of the board
11 for 17 years, so I've been involved in the opiate
12 crisis all the way through that. A lot of the
13 documents that, you know, are in -- you know, that I
14 reviewed are the board's documents, my board's
15 documents, community plans, epidemiological
16 information of overdoses, you know, looked at
17 trends, you know, number of people beginning in,
18 like, 2016 where started seeing opiate use disorder
19 creeping up in our Top 10 list. That's in our
20 community plan. That's part of that document.

21 Q. Who selected the documents that you
22 reviewed?

23 A. I did a lot of those, and then when I
24 talked to the prosecutor's office, or Tony
25 Villanueva from TAG, the director, Jim Schaffner, at